

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC.,¹

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

Re: Docket No. 1521

**CERTIFICATION OF COUNSEL REGARDING MOTION OF MARIA
MARGARITA AGUILAR MARTINEZ FOR RELIEF FROM THE PLAN INJUNCTION**

The undersigned counsel to the Plan Administrator in the above-captioned case hereby certifies as follows:

1. On August 1, 2025, the *Motion of Maria Margarita Aguilar Martinez for Relief from the Plan Injunction* [Docket No. 1521] (the “Motion”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto was a proposed form of order granting the relief requested in the Motion (the “Proposed Order”).

2. Pursuant to the notice of Motion, the deadline to file an objection to the Motion was August 8, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

3. The Objection Deadline was subsequently extended to January 6, 2026 and the hearing on the Motion was adjourned to the omnibus hearing scheduled for January 13, 2026 at 10:00 a.m. (ET).

4. Prior to the extended Objection Deadline, counsel to Ms. Maria Margarita Aguilar Martinez received informal responses to the Motion and Proposed Order from counsel to the Plan Administrator and counsel to the GUC Trust.

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

5. Additionally, on January 6, 2026, Liberty Mutual Insurance Company (“Liberty Mutual”) filed the *Limited Objection to Motion of Maria Margarita Aguilar Martinez for Relief from the Plan Injunction* [Docket No. 1931] (the “Liberty Mutual Objection”)

6. Counsel to Ms. Maria Margarita Aguilar Martinez, counsel to the Plan Administrator, counsel to the GUC Trust, and counsel to Liberty Mutual have agreed to a revised Proposed Order, attached hereto as **Exhibit A** (the “Revised Proposed Order”).

7. The Revised Proposed Order resolves the informal comments of the Plan Administrator, the GUC Trust, and the Liberty Mutual Objection.

8. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

9. The Plan Administrator, on behalf of counsel to Ms. Maria Margarita Aguilar Martinez, respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

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Dated: January 12, 2026
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

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